

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Service Rules for the 698-746, 747-762)	WT Docket No. 06-150
and 777-792 MHz Bands)	
)	
Revision of the Commission's Rules to Ensure)	CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency)	
Calling Systems)	
)	
Section 68.4(a) of the Commission's Rules)	WT Docket No. 01-309
Governing Hearing Aid-Compatible)	
Telephones)	
)	WT Docket No. 03-264
Biennial Regulatory Review – Amendment of)	
Parts 1, 22, 24, 27, and 90 to Streamline and)	
Harmonize Various Rules Affecting Wireless)	
Radio Services)	
)	WT Docket No. 06-169
Former Nextel Communications, Inc.)	
Upper 700 MHz Guard Band)	
Licenses and Revisions to Part 27 of)	
the Commission's Rules)	
)	PS Docket No. 06-229
Implementing a Nationwide,)	
Broadband, Interoperable Public)	
Safety Network in the 700 MHz)	
Band)	WT Docket No. 96-86
)	
Development of Operational, Technical and)	
Spectrum Requirements for Meeting Federal,)	
State and Local Public Safety		
Communications Requirements Through the		
Year 2010		

COMMENTS OF YORK COUNTY

York County hereby submits these reply comments in response to the Commission's

Further Notice of Proposed Rulemaking in the above-captioned proceedings.

York County Government, South Carolina recently purchased and implemented Motorola's High Performance Data Product to address the County's critical need to provide mobile data in the field to our Public Safety and emergency response community. York County Government, as many local governments are constantly facing difficult decisions of how to invest funds into the constantly changing technology. We must constantly evaluate our needs versus the life expectancy of technology. One of the critical issues that we considered in choosing to invest into mobile data technology now was the expected release of 700 MHz spectrum in the near future. The HPD product, as well as other public safety data products evaluated, held the promise of being able to utilize the 700 MHz spectrum with a software upgrade to provide broadband speed data for our field units without having to reinvest in the infrastructure. In the past, most mobile data systems did not allow a migration path to a newer technology without major upgrades. Motorola's High Performance Data, as well as other technologies the county researched, have been developed with a migration path from the existing technology in the 800 MHz spectrum to new technology for faster speeds in the 700 MHz spectrum without a "back haul" infrastructure upgrade.

I request the commission to reconsider the "tentative conclusion" that the current public safety data spectrum, which had been identified for wideband use, should be used to support only broadband operations consistent with nationwide standards. While I recognize the need for a nationwide standard and interoperability, York County Government has invested local funds to implement technology for our emergency responder that will meet our needs with the availability of 700 MHz spectrum. The safety of our responders is of utmost importance and the ability to

provide critical information in a timely manner is critical. Broadband data will significantly enhance our ability to protect our citizens and reduce hazards to our emergency responders.

Nationwide public safety broadband is a certainly a need but it should not be addressed at the expense of the current investment that has been made by local governments. With the rapid changes in technology, I do not believe that local governments and public safety should be required to take “a wait and see approach” over the next eight to ten years, while a nationwide broadband network is built. I do not believe a clear plan has been developed to address the needs of our public safety community, in a timely manner, in such a nationwide proposal.

Respectfully submitted,

Name

Date